



Robert E. Richards Pg 1 of 16

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September 30, 2022

Via CM/ECF and Email

The Honorable Sean H. Lane
United States Bankruptcy Court for the
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: In re 85 Flatbush RHO Mezz LLC,
Case No. 20-23280-shl (Bankruptcy S.D.N.Y.) (Jointly Administered)

Dear Judge Lane:

TH Holdco, LLC (“TH Holdco”) opposes the relief sought in the letter filed by Seyfarth Shaw LLP last evening and requests an emergency hearing before your Honor on October 3, 2022 to address the relief sought in the letter.

The only asset of 85 Flatbush Mezz LLC (“Mezzanine Lender”) is its claim on the mezzanine loan in the Mezzanine Debtor estate and thus, Mezzanine Lender has pursued a pattern of continued and flagrant violations of the Intercreditor Agreement and delay believing there is no effective remedy against it for these violations. TH Holdco believes that key inducements to this Court granting the limited 60 day stay were (i) the requirement that Mezzanine Lender post a \$5 million bond¹ in exchange for that 60 day stay and (ii) the fact that the time of the stay was of definite and limited duration. Mezzanine Lender now seeks a potentially indefinite extension to the stay “to a date three business days after the District Court issues its ruling(s) in Mezzanine Lender’s and the

¹ With respect to the initial \$5 million bond, this Court said :

I will grant a limited stay of two months, although, I might be talked down to that to one month. What I'm trying to do is give the district court an ability to address any requests for a further stay that it wants to address. But I think there's really been no showing that a bond should be waived here. I think a bond is the normal procedure for a good reason and I think on this record there are harms that have been identified.

See August 3, 2022 Hearing Tr. at p. 65.

Debtors' fully-briefed appeals" with no additional stay bond to protect TH Holdco from incurring further costs and damages relating to the stay.

As set forth in the email chain attached as Exhibit 1 hereto, TH Holdco was willing to agree to an extension with an outside date of October 17, 2022 (14 days – the outside additional time the District Court indicated it needed to issue a ruling) for an additional bond of \$1.2 million which matches the approximately \$84,000 per day for the original bond of \$5 million for 60 days and is still prepared to so agree.

TH Holdco's current damages already exceed the existing \$5 million bond amount, including, without limitation, due to the following:

Default Interest Accruing on the Mortgage Note	Over \$3.5 million
Lost Hotel Revenues/Profits	Over \$1.6 million
Lost Residential Revenue/Profits	Over \$500,000
Attorneys' Fees ²	Over \$450,000
Repairs, Maintenance and Wear and Tear	Over \$400,000
Interest and Penalties on the Unpaid Real Estate Taxes	Approx. \$65,000
Expiration of Liquor License	Unknown – Being Investigated
Diminishment in Cash Collateral/Collateral Value	Unknown – Being investigated
Other Harms	Unknown – Being investigated
TOTAL	Over \$6.5 million

TH Holdco's estimated additional damages for a 14 day extension to October 17, 2022 would be at least \$1.4 million from the same sources of damages. The Mezzanine Lender is not prejudiced by the posting of an additional bond as the funds will be returned to them if they prevail on the appeal. TH Holdco, however, will be prejudiced if no bond is posted as again, the Mezzanine Lender is judgment proof.

TH Holdco already provided the testimony of Mr. Franco Famularo outlining the damages that TH Holdco would incur as a result of a stay. See Declaration of Franco Famularo in Support of TH Holdco LLC's Objection to Motion for Stay Pending Appeal [Docket No. 302]. TH Holdco is prepared to present additional testimony from Mr. Famularo in support of the additional bond request, and to cross examine under oath any

² The attorneys fee number does not include fees that would have been incurred in any event in a normal closing of the credit bid in early August, 2022 absent the stay.

witnesses which the Mezzanine Lender or the Debtors propose to present in opposition to the additional bond request.

TH Holdco's damages could be much greater than the amounts and categories set forth above but that cannot be determined until the Debtors provide relevant information set forth below. For instance:

1. Delinquent Monthly Operating Reports: The Debtors are now delinquent in filing their June 2022, July 2022 and August 2022 Monthly Operating Reports and related bank statement attachments, despite several requests therefore from TH Holdco.³ That information may be directly relevant to the harms incurred to date or the harms which may be incurred going forward. The Debtors should be required to file those reports by no later than October 2, 2022 before the Court considers any extension of the stay and the additional bond issue.
2. Expiration of Liquor License: TH Holdco has recently learned that the Debtors have allowed the liquor license for the Hotel to expire. The ability to serve alcohol is key to a hotel and its revenues and value. Best case, this is gross negligence. At worst, it appears to be sabotage of the Hotel to spite TH Holdco. The Debtors should be required to file by no later than October 2, 2022 a sworn detailed declaration by a knowledgeable and responsible officer of the Debtors under oath (not the understanding of Debtors' counsel in a pleading or in a representation to the Court) as to the circumstances under which the liquor license came to be expired before the Court considers any extension of the stay and the additional bond issue.
3. Closing Cooperation: Despite TH Holdco being the largest creditor and the Court approved Buyer, the Debtors counsel (after promising they would be cooperative on preparing for closing) have been completely nonresponsive on all information requests and cooperation items. See email chain attached as Exhibit 2 hereto. The stay order [Docket No. 312] only stayed TH Holdco from closing on its credit bid. It intentionally did not stay preparations for closing prior to the stay's expiration. The Debtors or their counsel should be required to provide by no later than October 2, 2022 and file with this Court a detailed item by item response to

³ The Debtors were also previously delinquent on their March, 2022, April, 2022 and May 2022 Monthly Operating Reports and only filed them after TH Holdco raised the issue in its objection to the fee application of Debtors' counsel. The fact that the Debtors are now three months delinquent again suggests that they may be intentionally trying to hide the ball on the current performance of the Properties and their disbursements.

each of the items set forth in the August 29, 2022 email of Mr. Christopher Milenkevich of Dentons attached as Exhibit 2 hereto and either provide the requested information as part of that response or provide a specific commitment as to when any item not immediately provided will be provided.

If this Court is inclined to extend the stay, TH Holdco respectfully requests that such extension not exceed 14 days, and be conditioned on (i) the posting of an additional \$1.2 million bond and (ii) provision of the information set forth above by no later than October 2, 2022. We thank the Court for its attention to this matter.

Very truly yours,

Dentons US LLP



Robert E. Richards

Enclosures

Cc: M. Ryan Pinkston
Kevin Nash
Fred Ringel
Lori Schwartz
Lauren Macksoud
Emilie Cooper
The Office of the United States Trustee

EXHIBIT 1

From: Macksoud, Lauren
Sent: Thursday, September 29, 2022 4:12 PM
To: Pinkston, Ryan; Richards, Robert E; Emilie.Cooper@friedfrank.com
Cc: Lori Schwartz; Fred Ringel; Kevin J Nash
Subject: RE: 85 Flatbush Appeals

Ryan,

Judge Lane conditioned the 60 day stay on the posting of a \$5 million bond, which reflects a bond amount of approximately \$84,000 per each day of the stay. Our request for the additional \$1.2 million reflects an extension of that condition for 14 days. TH Holdco has a rough estimate of the costs and damages incurred to date on account of the stay and will be in a position to present evidence to support that estimate if and when it is appropriate for TH Holdco to draw on the bond. The current estimate exceeds the \$5 million dollar bond posted.

Posting of an additional \$1.2 million now cannot result in a windfall to TH Holdco. It will either reimburse them for actual damages sustained as a result of the extended stay or it will be returned to the entity that posted it if there are less than \$6.2 million of damages. The Debtors' or Mezz Lender's failure to post an additional bond, however, can result in harm to TH Holdco. Therefore, we believe the request for an additional bond is appropriate. We will make this argument to Judge Lane if necessary.

We further note that despite repeated requests, the Debtors again have not filed monthly operating reports for the past three months (June, 2022, July, 2022 and August 2022) in violation of their obligations as Debtors in Possession which makes it hard for TH Holdco, the Court, the Office of the US Trustee or other parties in interest to see the performance of the Properties or disbursements. Further, inexplicably, the Debtors have apparently let their liquor license lapse which is a material harm to the value of the Hotel Property and its future revenues.

Thanks,

Lauren



Lauren Macksoud, Esq.

Partner

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Assistant: Iris A. Ortiz

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From: Pinkston, Ryan <RPinkston@seyfarth.com>
Sent: Thursday, September 29, 2022 2:32 PM
To: Macksoud, Lauren <lauren.macksoud@dentons.com>; Richards, Robert E. <robert.richards@dentons.com>; Emilie.Cooper@friedfrank.com
Cc: Lori Schwartz <lschwartz@leechtishman.com>; Fred Ringel <fringel@leechtishman.com>; Kevin J Nash <kjnash@gwulaw.com>
Subject: RE: 85 Flatbush Appeals

[WARNING: EXTERNAL SENDER]

Lauren,

Do you have any evidence to substantiate that costs and damages have been incurred to date on account of the existing stay pending appeal and in what amount? Or, evidence to substantiate that any additional costs and damages--let alone in the amount of \$1.2 million--will be incurred during the very brief extension requested? Our purely administrative request for an additional week or two on account of the District Court's unforeseen scheduling issue is not an opportunity for a windfall (or, most likely, further windfall) to TH Holdco.

We're inclined to write to Judge Lane today to seek a short extension of the stay without an additional bond requirement, and we'll advise Judge Lane of TH Holdco's response below.

Sincerely,
Ryan

M. Ryan Pinkston | Partner | Seyfarth Shaw LLP
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From: Macksoud, Lauren <lauren.macksoud@dentons.com>
Sent: Wednesday, September 28, 2022 2:16 PM
To: Pinkston, Ryan <RPinkston@seyfarth.com>; Richards, Robert E. <robert.richards@dentons.com>; Emilie.Cooper@friedfrank.com
Cc: Lori Schwartz <lschwartz@leechtishman.com>; Fred Ringel <fringel@leechtishman.com>; Kevin J Nash <kjnash@gwulaw.com>
Subject: RE: 85 Flatbush Appeals

Ryan,

We have reviewed Judge Seibel's order and have connected with TH Holdco on your request below. Given the time frame referenced in Judge Seibel's order, TH Holdco is willing to agree to an extension of the existing stay through the earlier of 5:00 pm ET on (i) October 17, 2022, or (ii) the day on which the District Court rules on the pending appeals, provided that the existing \$5 million bond remains in place, and an additional \$1.2M bond is posted to cover any additional costs and damages arising after October 3, 2022. If agreed, please prepare a conforming stipulation for our review. Please note, TH Holdco reserves all rights, including but not limited to any further requests for a stay or an extension of a stay and/or the right to seek posting of a further increased bond.

Regards,

Lauren



Lauren Macksoud, Esq.

Partner

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From: Pinkston, Ryan <RPinkston@seyfarth.com>

Sent: Wednesday, September 28, 2022 11:35 AM

To: Macksoud, Lauren <lauren.macksoud@dentons.com>; Richards, Robert E. <robert.richards@dentons.com>; Emilie.Cooper@friedfrank.com

Cc: Lori Schwartz <lschwartz@leechtishman.com>; Fred Ringel <fringel@leechtishman.com>; Kevin J Nash <kjnash@gwulaw.com>

Subject: 85 Flatbush Appeals

[WARNING: EXTERNAL SENDER]

Hi Lauren,

As you may have seen, Judge Seibel entered a text order this morning that states as follows:

ORDER: This is to advise the parties that although the Court had intended to decide this appeal on or before October 3, 2022, it will not be able to do so, due to unforeseen circumstances. The Court expects to rule within a week or two thereafter. (HEREBY ORDERED by Judge Cathy Seibel) (Text Only Order) (Seibel, Cathy)

In light of this development, I write to request that the parties agree to a brief extension of Judge Lane's stay pending appeal to a date not later than three business days after Judge Seibel has issued her ruling in the Debtors' and the mezzanine lender's appeals from plan confirmation. We believe the short extension is appropriate in view of Judge Lane's rationale for entering the stay and also Judge Seibel's commitment to ruling in short order. I've discussed this with Lori Schwartz, and the Debtors agree with this request. Please let us know your thoughts, and we'll prepare a stipulation for review and approval.

Thank you,
Ryan

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EXHIBIT 2

From: Milenkevich, Christopher
Sent: Sunday, September 18, 2022 8:48 AM
To: Charles McKeen
Cc: Lori Schwartz; Richards, Robert E.; Macksoud, Lauren
Subject: RE: 85 Flatbush closing

Charles –

I am writing to follow up on the requests below. My client is asking for responses by the close of business on Tuesday, September 20th – please provide the same, and in the meantime please let me know if you have any questions regarding any of the requested items or information.

Thank you very much,

Chris



Christopher Milenkevich

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From: Milenkevich, Christopher
Sent: Monday, August 29, 2022 1:29 PM
To: Charles McKeen <cmckeен@leechtishman.com>
Cc: Lori Schwartz <lschwartz@leechtishman.com>; Richards, Robert E. <robert.richards@dentons.com>; Macksoud, Lauren <lauren.macksoud@dentons.com>; Resnick, Avi M. <avi.resnick@dentons.com>
Subject: RE: 85 Flatbush closing

Charles:

Further to our correspondence earlier this month, my client TH Holdco LLC, as prospective purchaser (through one or more nominees) of the 85 Flatbush Avenue Extension (Tillary Hotel) property, would like to make (or, in some cases, remake) the below requests for items and information relating to the property, in anticipation of a closing of the sale of the property pursuant to the confirmed Plan upon the lifting or expiration of the stay.

As Lori (cc'd here) is aware, some of these items have been requested before but not yet provided, so if you all would please coordinate on securing delivery of those previously-requested items, that would be much appreciated.

After you've had a chance to review the list, please feel free to give me a call to discuss it as needed, and otherwise kindly work with your client to obtain and provide the requested items at your earliest convenience.

Thanks very much,

Chris

ITEMS/INFORMATION REQUEST LIST

1. **Monthly Operating Reports:** June and July MOR's (currently delinquent).

2. **Leases & Contracts:** Copies of:

- a. All current leases, together with information giving status of same as to (i) occupancy, (ii) rent payment, (iii) any other defaults.
- b. Copies of all current contracts.
- c. Copies of all current permits and current licenses.

3. **Utilities:**

- a. Utility account numbers.
- b. Deposit amounts for each respective utility.

4. **Physical Items for Delivery:** Current location, and plan for delivery on closing date, of:

- a. Keys.
- b. Printed marketing collateral.

5. **Employee Information:** Current copies, together with plan for delivery on closing date, of:

- a. List of current employees at the property.
- b. Current Employee Handbook.
- c. Employee files.
- d. Payroll Register with PTO accruals.
- e. Executive Team Member Resumes.
- f. Listing of all EEOC - NYC DOHR and all other labor or wage claims.

6. **Technology:**

- a. List of onsite hardware (computers, servers, network infrastructure, etc.), together with a plan for delivery on closing date of control of the same, including passwords to all computer terminals.

- b. Plan for delivery on closing date of control of reputation management handles and admins including Google My Business Listing.

7. Intellectual Property:

- a. Registrant information and account access information for URL's / domains.
- b. Plan for delivery on closing date of control of electronic files for logos and associated trademarks.

8. Financial Information: Copies of:

- a. Current data from existing PMS (Opera).
- b. Historical loss runs under insurance policies.
- c. List of historical top 20 accounts.

Regards,

Chris

 Christopher Milenkevich

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From: Milenkevich, Christopher

Sent: Wednesday, August 03, 2022 3:32 PM

To: Charles McKeen <cmkeen@leechtishman.com>

Cc: Lori Schwartz <lschwartz@leechtishman.com>; Richards, Robert E. <robert.richards@dentons.com>; Macksoud, Lauren <lauren.macksoud@dentons.com>; Resnick, Avi M. <avi.resnick@dentons.com>

Subject: RE: 85 Flatbush closing

Charles –

Further to our conversation yesterday and my e-mail below, please find attached execution versions of the purchase and sale documents for the 85 Flatbush closing:

- Purchase and Sale Agreement
- Bargain and Sale Deed
- Bill of Sale (Hotel and Commercial Units)
- Bill of Sale (Residential Unit)
- Assignment and Assumption of Lease and Security Deposit

Also attached is a .pdf signature page packet that you can print and have executed. I am checking with the title company as to what address executed pages should be sent to be held in escrow, and will advise as soon as I hear back from them.

Blacklines are attached against the final form of each document from the Confirmation Order, to show completion of the names of TH Holdco LLC's designees, completion of other blanks and brackets with appropriate Docket references etc., and updates to reflect that the Confirmation Order has been entered, as well as to reflect the role of JLL as broker.

In particular, please note that there are two Bills of Sale, as a separate designee entity is acquiring the personal property for the Hotel and Commercial Unit versus the Residential Unit.

Pending Lori's confirmation from the Sellers' management company, we have indicated in the Assignment and Assumption of Lease and Security Deposit that there are \$0 of security deposits held, since we do not believe there is any security deposit under the DHS lease (Hotel Use Agreement), which is the only lease being assumed by the Purchaser.

Please feel free to call me with any questions.

Regards,

Chris



Christopher Milenkevich

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From: Milenkevich, Christopher

Sent: Tuesday, August 02, 2022 12:50 PM

To: Charles McKeen <cmckeен@leechtishman.com>

Cc: Lori Schwartz <lschwartz@leechtishman.com>; Richards, Robert E. <robert.richards@dentons.com>; Macksoud, Lauren <lauren.macksoud@dentons.com>; Resnick, Avi M. <avi.resnick@dentons.com>

Subject: RE: 85 Flatbush closing

Charles –

Thank you for speaking with me just now. As discussed, attached is a copy of the Order confirming the creditor's plan providing for sale of the Tillary Hotel (85 Flatbush Avenue Extension, Brooklyn, NY).

The approved Purchase and Sale Agreement (PSA) is attached as Exhibit 2 to the Order, and Schedule IV to the PSA sets forth the Seller closing document deliverables. The form of Deed and other instruments of transfer are also attached as Exhibits A through C to the PSA.

We are currently preparing execution version of the PSA and the instruments of transfer. **To that end, could you please provide us with the current signature blocks for each Seller entity, and we can then turn around to you a signature page packet for execution?**

I'll send a separate e-mail looping you in with the Fidelity team who will be assisting with this closing.

I look forward to working with you on this.

Thanks,

Chris



Christopher Milenkevich

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From: Lori Schwartz <lschwartz@leechtishman.com>

Sent: Tuesday, August 02, 2022 10:47 AM

To: Milenkevich, Christopher <christopher.milenkevich@dentons.com>

Cc: Charles McKeen <cmckeен@leechtishman.com>

Subject: 85 Flatbush closing

[WARNING: EXTERNAL SENDER]

Chris,

My partner, Charlie McKeen, copied here, will be handling the closing on the 85 Flatbush matters. Here is his complete contact info:

Charles E. McKeen | Partner
cmckeен@leechtishmanrb.com



LEECH TISHMAN ROBINSON BROG, PLLC
leechtishmanrb.com

875 Third Avenue, 9th Floor
New York, NY 10022
T: 212.603.6300 | M: 646.580.5360 | F: 212.956.2164
Direct: 212.603.6356 | Toll-Free 844.750.1600

You can also reach out to me with any questions.

Thank you,

Lori Schwartz | Partner
lschwartz@leechtishmanrb.com



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